

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:)	
)	
NICOLE DONNETTE STEELEY)	Case No. 19-34628-KRH
)	Chapter 13
Debtor)	

**MOTION TO EXPEDITE HEARING ON MOTION
TO INCUR DEBT AND TO SHORTEN NOTICE PERIOD**

COMES NOW the Debtor, by counsel, and moves this Court to Expedite the Hearing on her Motion to Incur Debt and to Shorten Notice Period, and in support thereof states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on September 05, 2019.
2. The Debtor has applied for and Movement Mortgage, LLC. has approved a loan to the Debtor in the amount of \$311,258.00 plus interest at 2.625% per annum to be repaid with 360 equal monthly payments of approximately \$1,250.17 for principal, interest, and escrow for the purchase of a home located at 10406 Brynmore Drive, North Chesterfield, VA 23237. The closing costs are to be paid by the Debtor's spouse and mother-in-law.
3. The purchase price of the Property is \$317,000.
4. There will be no loan proceeds payable to the Debtor.
5. The purchase of the Property is in the best interest of the Debtor and will facilitate the Debtor's ability to perform under her Chapter 13 Plan filed herein.

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

6. The Debtor's Chapter 13 Plan has been confirmed.

WHEREFORE, the Debtor respectfully requests that the Court expedite the hearing on their Motion to Incur Debt, Shorten the Notice Period required for said Motion and for such other and further relief as is just and proper.

Dated: October 18, 2021

NICOLE DONNETTE STEELEY

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

CERTIFICATION

I, James E. Kane, pursuant to Local Rule 9013-1(N), do hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing,
2. I have not created the emergency through any lack of due diligence.
3. I have made a *bona fide* effort to resolve the matter without hearing.

By: /s/ James E. Kane
James E. Kane

CERTIFICATE OF SERVICE

I hereby certify that on October 18, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and will mail the same by first class mail, postage pre-paid, to the parties on the attached list.

/s/ James E. Kane
Counsel for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT
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NOTICE OF MOTION AND HEARING

The above Debtor has filed papers with the Court to request an order to Expedite the hearing and to Shorten the Notice Period with respect to her Motion to Incur Debt.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing scheduled for **October 20, 2021 at 12:00 p.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

- **REMOTE HEARING INFORMATION:**

Due to the COVID-19 public health emergency, no in-person hearings are being held.

This hearing will take place remotely through Zoom on the date and time scheduled herein.

To appear at the hearing, you must send, by email, a completed request form (the “Zoom Request Form”), which is available on the Court's internet website at www.vaeb.courts.gov, on the page titled, “Temporary Emergency Provisions Regarding ZoomGov Remote Proceeding Access Information.” Email your completed Zoom Request Form to the email address listed for the Judge assigned to the case. Following receipt of your Zoom Request Form, Court staff will respond to the email address from which the request was submitted with additional information on how to participate through Zoom.

***The email address shall be used only to submit Zoom Request Forms. No other matters or requests will be considered by Court staff, and under no circumstances will any such matters or requests be brought to the Judge’s attention. Failure to comply with these instructions may result in appropriate action, including but not limited to the imposition of sanctions.

***** PLEASE NOTE: You MUST submit the Zoom Request Form no later than two (2) business days prior to this hearing. Any documentary evidence the parties wish to present at the hearing must be filed with the Court in advance of the hearing.**

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: October 18, 2021

NICOLE DONNETTE STEELEY

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
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/s/ James E. Kane
Counsel for Debtor

Alfredo Sunga
c/o JFB Management
410 N. Ridge Rd. Suite 100
Henrico, VA 23229

Ballato Law Firm
3721 Westerre Parkway
Suite A
Henrico, VA 23233

Bank of America
Attn: Bankruptcy
P.O. 982284
El Paso, TX 79998

Capital One
Attn: Bankruptcy
Po Box 30285
Salt Lake City, UT 84130

Capital One Auto Finance
Attn: Bankruptcy
Po Box 30285
Salt Lake City, UT 84130

Carmel Holding Co
10660 Argonne Dr.
Glen Allen, VA 23060

Check Into Cash
3059 Mechanicsville Tnpk
Richmond, VA 23223

City of Richmond
Parking Tickets
P.O. Box 26508
Richmond, VA 23261

City of Richmond
900 E Broad Street
Room 109 Delinquent Taxes
Richmond, VA 23219

CJW Medical Center
PO Box 99400
Louisville, KY 40269

Continental Finance Company
Attn: Bankruptcy
Po Box 8099
Newark, DE 19714

Credit Acceptance
25505 W. Twelve Mile Rd
Ste. 3000
Southfield, MI 48034

Emergency Coverage Corp.
c/o ARS
PO Box 8668
Coral Springs, FL 33075-8668

Express Lanes
PO Box 28148
New York, NY 10087

First Premier Bank
Attn: Bankruptcy
Po Box 5524
Sioux Falls, SD 57117

Focused Recovery Solutions
9701-Metropolitan Ct
Ste B
North Chesterfield, VA 23236

Genesis Bc/celtic Bank
Attn: Bankruptcy
268 South State Street Ste 300
Salt Lake City, UT 84111

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101

Mariner Finance
13102 Midlothian Tnpk.
Midlothian, VA 23113

Maryland Transportation Auth.
PO Box 17600
Baltimore, MD 21297

NetCredit
175 W. Jackson Blvd., Suite 1000
Chicago, IL 60604

New York State Dept of Tax
NYS Assesment Receivables
P.O. Box 4127
Binghamton, NY 13902

NYC Housing Authority
250 Broadway, 9th Floor
New York, NY 10007

PayPal
PO Box 105658
Atlanta, GA 30348-5658

Paypal
ATTN BANKRUPTCY
Po Box 45950
Omaha, NE 68145

Plaza Services, Llc
Attn: Bankruptcy
110 Hammond Dr. Ste 110
Atlanta, GA 30328

Professional Account Mgmt
386 Pickett St
PO Box 22147
Alexandria, VA 22304

Radiology Assoc of Richmond
PO Box 13343
Richmond, VA 23225

Receivables Management Systems
PO Box 17305
Richmond, VA 23226

Shawn C. Tuthill
c/o Liberty Homes Inc
8249 Crown Colony Parkway A
Mechanicsville, VA 23116

Square Inc.
1455 Market St.
Suite 600
San Francisco, CA 94103

The Port Authority
PO Box 15183
Albany, NY 12212

Violations Processing Center
EZ-Pass NY
P.O. Box 15186
Albany, NY 12212

Virginia Dept. of Taxation
P O Box 2156
Richmond, VA 23218

Wells Fargo Dealer Services
Attn: Bankruptcy
Po Box 19657
Irvine, CA 92623